# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

19766

IN RE: VALSARTAN, LOSARTAN, AND

IRBESARTAN PRODUCTS LIABILITY

LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Jo Ann Hamel, et al. v, Prinston Pharmaceutical, Inc., et al.,

Case No. 1:19-cv-06146

### NOTICE OF VIDEOTAPED DEPOSITION OF

### **PLAINTIFF JO ANN HAMEL**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Jo Ann Hamel on January 27, 2021 at 9:00 a.m. PST at 2147 Bristol CT, Merced, California 95340. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Jessica M. Heinz CIPRIANI & WERNER, P.C. 450 Sentry Parkway East Suite 200 Blue Bell, PA 19422 (610) 567-0700 jheinz@c-wlaw.com

Date: December 28, 2020 Respectfully submitted,

s/ Jessica M. Heinz
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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of December, 2020 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Jo Ann Hamel was served upon the following by e-mail, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

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s/ Jessica M. Heinz Jessica M. Heinz